

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHARLES TILL)	
)	
Plaintiff,)	
)	No: 21-cv-1256
v.)	
)	Judge: Hon. Thomas M. Durkin
NATIONAL GENERAL)	
ACCIDENT AND HEALTH)	
INSURANCE COMPANY)	
)	
Defendant.)	

PARTIES INITIAL JOINT STATUS REPORT

NOW COMES the Plaintiff, Charles Till, by his attorneys, John C. Kreamer and Joseph E. Urani, and Defendant, National General, by and through their attorney, Dennis Berg, and jointly submit this Joint Status Report pursuant to this Court's 3/5/21 order as follows:

I. Nature of the Case:

a. Attorneys of Record:

John C. Kreamer (lead)
Joseph E. Urani
Kreamer Law Group, LLC
Attorneys for Plaintiff

Dennis A Berg (lead)
Pipal & Berg LLP
Attorneys for Defendant

- b. Basis for Federal Jurisdiction: The basis for jurisdiction in this matter is federal question under 28 U.S.C section 1331 and ERISA, 29 U.S.C. section 1132(a)(3).

- c. Nature of the Claims: Plaintiff is seeking redress for the denial of benefits pursuant to ERISA.

II. Pending Motions and Case Plan:

- a. Pending Motions: None

- b. Proposed Discovery Plan:

- i. Discovery needed: The parties anticipate making Rule 26(a) disclosures, propounding interrogatories and production requests to each other. The parties anticipate the need to take depositions of all disclosed fact witnesses, including multiple doctors.
 - ii. Date to issue: The parties propose exchanging Rule 26(a) disclosures by June 14, 2021 and propounding written discovery on each other by June 21, 2021.
 - iii. Expert Discovery: The parties do not fully know the potential need for expert discovery relevant to dispositive motions at this time but will address the same with the Court if that is determined during the course of discovery.
 - iv. Fact discovery Completion: The parties propose having fact discovery completed by February 21, 2022.
- c. E-Discovery: The parties do not anticipate the need for any E-Discovery or anticipate any E-Discovery disputes at this time. The parties will address the same with the Court if that need arises.

- d. Jury Trial: Plaintiff did request a jury demand in this matter. At this time, the parties anticipate that the trial would last approximately 3-4 days.

III. Consent to Proceed Before a Magistrate Judge:

The parties do not unanimously agree to proceed before a Magistrate Judge at this time.

IV. Status of Settlement Discussions:

The parties have discussed the topic of settlement but do not foresee any potential to pursue the same, or to pursue a settlement conference with the Magistrate Judge at this time.

Respectfully Submitted,

By: /S/ Joseph E. Urani
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CERTIFICATE OF SERVICE

A copy of the above document was filed electronically this 14th day of May, 2021 with the Clerk of the Court using the CM/ECF System. Parties may access this filing through the court's electronic system.

By: /s/ Joseph E. Urani